

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

MATCH GROUP, INC., a corporation,
MATCH GROUP, LLC, formerly known as
MATCH.COM, LLC, a limited liability
company,

Defendants.

Case No. 3:19-cv-02281-K

**Plaintiff Federal Trade Commission's
Witness List**

FILED UNDER SEAL

Pursuant to the Court's Amended Scheduling Order (Doc. 279), Plaintiff Federal Trade Commission submits the following Witness List. The Federal Trade Commission may call the following witnesses to testify, either in person or by deposition, in their case-in-chief or in rebuttal to Defendants Match Group, Inc. ("MGI") and Match Group, LLC ("MGLLC")'s case-in-chief.

Plaintiff's Witness List is submitted without prejudice to the Plaintiff's right to modify it based on the witnesses designated by Defendants; the evidence introduced or proffered by Defendants at trial; for purposes of resolving evidentiary issues, including to testify regarding the authenticity of or foundation for exhibits to the extent the parties cannot agree on such issues; and for purposes of impeachment.

The FTC reserves the right to amend or supplement this list in light of any case developments, including any rulings by the Court, any change in position or theories by Defendants or their witnesses, Plaintiff's review of Defendants' pre-trial disclosures, and any additional documents or information produced. Plaintiff also reserves the right to use deposition

testimony given by any witness whose testimony may be used at trial pursuant to Federal Rule of Civil Procedure 32. In the event that Defendants object to the FTC's use of its deposition designations at trial, the FTC reserves the right to call the deponent to provide live testimony.

The FTC further reserves the right to update the subjects on which the persons identified as witnesses may testify based on new information (including any newly produced documents) and to question the persons identified herein on any topics on which that person testified in a deposition or regarding any matter that is discussed in any document to which that person had access and that is designated as an exhibit by either party.

I. PROBABLE WITNESSES

	Witness	Address	Summary of Testimony	Expected Duration
1.	Dushyant Saraph	8750 N Central Expy, Suite 1400, Dallas, TX 75231	Mr. Saraph's testimony will include coverage of the same subjects addressed when he served as MGLLC's 30(b)(6) representative and those covered during his individual deposition. He will testify to his duties and responsibilities during his employment by Defendants relating to Match.com. He will address the ownership and control of Match.com, and Match.com's relationship to MGLLC, Match Group North America ("MGNA"), MGI, and the Evergreen and Emerging Brands ("E&E"). He will testify to the identities and responsibilities of MGI and MGLLC Executives and employees. He will testify concerning the features and content of the Match.com website, including relating to subscription cancellation mechanisms. He will further discuss the Match.com website design, user interface, and	Direct examination: 12 hours Cross examination: 6 hours

			typical user experience. He will discuss Match.com's practices and procedures concerning A/B testing and the company's use of data analytics. Mr. Saraph will explain Match.com's policies and procedures, including specifically relating to the Match Guarantee, consumer chargebacks refund requests, consumer complaints, and subscription cancellation. He will testify concerning data produced by Defendants, including related to cancellation mechanisms and consumer subscription cancellations, the Match Guarantee, Match.com's revenue and profits, chargebacks, chargeback data. He will testify concerning revenue and profit for MGLLC. He will also testify concerning the marketing of the Match Guarantee. He will testify concerning MGLLC's discovery responses and MGI's response to the FTC's Civil Investigative Demand.	
2.	Adrian Ong	830 Bentwater Drive, Allen, TX 75002	Adrian Ong's testimony will include the subjects covered in his deposition testimony. He will address his positions, duties, and responsibilities relating to Defendants and Match.com and his corporate chain of command during his employment. He will explain MGLLC's operations and its policies and procedures, including relating to customer service, the Match Guarantee, payments and chargebacks, and cancellation. He will further testify concerning the Match.com website interface and user experience.	Direct examination: 4 hours Cross examination: 1 hour
3.	Kris Auderer	1801 N Pearl Street, Apt. 2204,	Ms. Auderer's testimony will include the subjects covered in her deposition testimony. She will	Direct examination: 6 hours

		Dallas, TX 75201	describe her duties and responsibilities while employed at MGLLC, her corporate chain of command, and her understanding of MGLLC's operations. She will discuss Defendants' policies and procedures, including relating to the Match Guarantee, cancellation, and refunds. She will testify concerning the operation of Defendants' customer care department. She will testify concerning various presentations she created and made during her time employed by Defendants. She will discuss proposals she made concerning changes to the website.	Cross examination: 3 hours
4.	Mandy Ginsberg	5552 Nakoma Drive, Dallas, TX 75209	Ms. Ginsberg's testimony will include the subjects address in deposition testimony. She will discuss MGI, MGNA, and MGLLC's operations, revenues/profits, and ownership, as well as their role in the operation of Match.com. She will testify concerning her work history and responsibilities, including her time as an executive at MGLLC and MGI, and her corporate chain of command. She will discuss Match.com's website design and user interface/experience, including as it relates to practices alleged in the complaint. She will discuss Defendants' policies and procedures relating to customer service, refunds, the Match Guarantee, chargebacks, and subscription cancellation. She will further establish MGI's knowledge of the alleged practices.	Direct examination: 4 hours Cross examination: 2 hours
5.	Hesam Hosseini	8750 N Central Expy, Suite 1400,	Mr. Hosseini will testify concerning his employment history and responsibilities as Defendants' employee. He will testify concerning Defendants'	Direct examination: 3 hours

		Dallas, TX 75231	corporate structure, revenue/profits, operations, and the relationship of Match.com to MGLLC, MGI, MGNA, and E&E. He will testify concerning Defendants' use of A/B testing and website analytics, the design and features of Match.com, and the companies' policies and procedures relating to the alleged practices.	Cross examination: 1 hour
6.	Jon Caine	8750 N Central Expy, Suite 1400, Dallas, TX 75231	Mr. Caine's testimony will include the subjects addressed in his deposition. He will testify concerning his employment history, the operations of his department, responsibilities as Defendants' employee, and chain of command. He will discuss policies and procedures relating to his various positions, product analytics and A/B testing, Match.com website features/design, and the Match.com user interface and user experience.	Direct examination: 3 hours Cross examination: 1 hour
7.	Giridhar Tandri	1009 Ridge Hollow Trl, Irving, TX 75063	Mr. Tandri's testimony will include the subjects addressed in his deposition. He will discuss policies and procedures relating to his various positions, product analytics and A/B testing, Match.com website features/design, and the Match.com user interface and user experience. He will further testify concerning his employment history, the operations of his department, responsibilities as Defendants' employee, and chain of command.	Direct examination: 2 hours Cross examination: 1 hour
8.	Elizabeth Anne Miles	230 S Dearborn St #3030, Chicago, IL 60604	Ms. Miles will testify concerning the FTC's calculations of monetary relief and civil penalties related to practices described in Count V, including calculations	Direct examination: 2 hours

			related to success rates of Match.com's online cancellation flow.	Cross examination: 1 hour
9.	Jim Talbott	8750 N Central Expy, Suite 1400, Dallas, TX 75231	Mr. Talbott will testify concerning his employment history and responsibilities as Defendants' employee. He will testify to explain the data produced by Defendants in response to the FTC's CID and in response to discovery requests. He will further testify concerning Defendants' use of data analytics and the Match Guarantee.	Direct examination: 3 hours Cross examination: 1 hour
10.	Jared Sine	8750 N Central Expy, Suite 1400, Dallas, TX 75231	Mr. Sine will testify concerning his employment history and responsibilities as MGI's General Counsel. He will further testify concerning Defendants' policies and procedures relating to legal compliance as it relates to Defendants' knowledge of law violations. He will further testify concerning MGI's Discovery responses and MGI's receipt of, and responses to, the FTC's Civil Investigative Demand.	Direct examination: 2 hours Cross examination: 1 hour
11.	Gary Swidler	8750 N Central Expy, Suite 1400, Dallas, TX 75231	Mr. Swidler will testify concerning his duties and responsibilities relating to his employment at MGI and Defendants' corporate structure, including specifically the Evergreen and Emerging Brands structure. He will further testify concerning facts relevant to Defendants' ability to pay civil penalties. This will include the state of Defendants' finances, including specifically the revenue and income for MGI, MGLLC, and Match.com.	Direct examination: 3 hours Cross examination: 1 hour
12.	Michele Watson	201 Lavaca Street, Apt. 233, Austin, TX 78701	Ms. Watson's testimony will include covering the subjects addressed in her deposition testimony. She will discuss her employment history at Match,	Direct examination: 2 hours

			including her duties and responsibilities and corporate chain of command. She will discuss the operations of the customer care department. She will discuss Defendants' policies and procedures, including relating to consumer complaints, refunds, chargebacks, and cancellation. She will testify concerning the Match Guarantee and related policies and testing. She will testify concerning the Match.com subscription cancellation process.	Cross examination: 1 hour
13.	Greg Blatt	9360 Balada Street, Miami, FL 33156	Mr. Blatt's testimony will include the same subjects covered in deposition testimony. He will testify concerning his duties and responsibilities while employed by Defendant, MGI's operations, its corporate structure, and involvement in the operations of Match.com and MGI's other dating sites. He will testify concerning MGI's authority to control its subsidiaries and related dating sites. He will testify concerning facts establishing Defendants' knowledge of the alleged practices.	Direct examination: 3 hours Cross examination: 1 hour

II. POSSIBLE WITNESSES

	Witness	Address	Summary of Testimony	Expected Duration
1.	Kacy Verdi	1999 Bryan Street, Suite 2150, Dallas, TX 75201	If called, Ms. Verdi would testify concerning the subjects addressed in her deposition. Ms. Verdi would testify concerning the FTC's calculations of monetary relief and civil penalties related to practices described in Count V, including calculations related to success rates of Match.com's online cancellation flow.	Direct examination: 2 hours Cross examination: 1 hour

2.	Melissa Clinchy	3969 Lively Lane, Dallas, TX 75220	If called, Ms. Clinchy's testimony would include the subjects covered in deposition testimony. She would discuss her work history as Defendants' employee, her duties and responsibilities, and chain of command. She would discuss the operations of the customer care department, including its policies and procedures and handling of Match.com consumer complaints. She would discuss policies and procedures concerning the Match Guarantee, refunds, customer chargebacks, and cancellation. She would further discuss the design and user experience relating to the Match.com website.	Direct examination: 2 hours Cross examination: 1 hour
3.	Jiten Vakharia	8750 N Central Expy, Suite 1400, Dallas, TX 75231	If called, Mr. Vakharia would testify concerning his employment history at Defendants and the operations of MGLLC and his department. He would further testify concerning the Match.com website features/design and user experience and Defendants' use of product analytics user interface and user experience.	Direct examination: 2 hours Cross examination: 1 hour
4.	Beth Wilson	206 Fall Creek Drive, Richardson, TX 75080	If called, Ms. Wilson would testify concerning her employment history with Defendants, her responsibilities and duties, and the work of her department. She would testify concerning user interface and experience as it relates to the Match Guarantee and subscription cancellation.	Direct examination: 2 hours Cross examination: 1 hour
5.	Dinh Thi Bui	8750 N Central Expy, Suite 1400, Dallas, TX 75231	If called, Mr. Bui would testify concerning his employment by Defendants, including his duties and responsibilities, and the operations of his department. He would further testify concerning the Match.com product design and user experience, cancellation	Direct examination: 4 hours Cross examination: 1 hour

			processes, and A/B testing and website analytics.	
6.	Pradeep Shetty	8750 N Central Expy, Suite 1400, Dallas, TX 75231	If called, Mr. Shetty would testify concerning his employment for Defendants and related duties and responsibilities. He would further testify concerning Defendants' policies and practices relating to payments and chargebacks.	Direct examination: 3 hours Cross examination: 1 hour
7.	Amarnath Thombre	8835 Lakemont Drive, Dallas, TX 75209	If called, Mr. Thombre would testify concerning his employment history for Defendants, his duties and responsibilities, and corporate chain of command. He would further testify concerning MGI's corporate structure and relationship with its subsidiaries and related brands. Mr. Thombre would further testify concerning Defendants' discovery responses.	Direct examination: 2 hours Cross examination: 1 hour
8.	Brett Richards	1908 Lucille Street, Dallas, TX 75204	If called, Mr. Richards would testify concerning his employment history with Defendants, his duties and responsibilities, and his department's operations, including as it relates to product design and user experience relating to the Match Guarantee and subscription cancellation.	Direct examination: 2 hours Cross examination: 1 hour
9.	Bret Williams	9320 Long Grove Avenue, Las Vegas, NV 89149	If called, Mr. Williams would testify concerning his duties and responsibilities as an employee of Defendants and the operations of his department. He would discuss Match.com's design and user interface/experience.	Direct examination: 2 hours Cross examination: 1 hour
10.	Jessica Johnson	8750 N Central Expy, Suite 1400, Dallas, TX 75231	If called, Ms. Johnson would testify concerning her duties and responsibilities as an employee of Defendants and the operations of her department. She would discuss the features and design of Match.com website relating to her position. She would discuss A/B testing and website analytics, and Match.com's cancellation flow.	Direct examination: 2 hours Cross examination: 1 hour

11.	Navin Ramachandran	6200 SW River Road, Hillsboro, OR 97123	If called, Mr. Ramachandran would testify concerning his employment history, chain of command, and duties and responsibilities as Defendants' employee. He would testify concerning MGI's corporate structure, and its involvement in the operations of its subsidiaries and related brands. He would testify concerning Defendants' policies and procedures, user experience, refund policy, and cancellation practices.	Direct examination: 2 hours Cross examination: 1 hour
12.	Sydney Lam	14735 Stanford Ct, Dallas, TX 75242	If called, Mr. Lam would testify concerning his employment history, duties and responsibilities, and corporate chain of command. He would discuss Defendants' policies and procedures and consumer complaints. He would discuss the Match.com product design and user interface/experience. He would further testify concerning the practices described in Counts III and V.	Direct examination: 2 hours Cross examination: 1 hour
13.	Steven Bailey	8750 N Central Expy, Suite 1400, Dallas, TX 75231	If called, Mr. Bailey would testify concerning facts relevant to determine Defendants' ability to pay the civil penalties sought by the FTC. Specifically, Mr. Bailey would provide information concerning revenue and profits for MGI, MGLLC, and Match.com's. Mr. Bailey would further testify concerning the Match.com website and cancellation flow.	Direct examination: 1 hours Cross examination: 1 hour
14.	Philip Eigenmann	8750 N Central Expy, Suite 1400, Dallas, TX 75231	If called, Mr. Eigenmann would testify concerning facts relevant to determine Defendants' ability to pay the civil penalties sought by the FTC. Specifically, Mr. Eigenmann would provide information concerning revenue	Direct examination: 1 hours Cross examination: 1 hour

			and profits for MGI, MGLLC, and Match.com's.	
15.	Jayant Dasari	8750 N Central Expy, Suite 1400, Dallas, TX 75231	If called, Mr. Dasari would testify concerning his corporate chain of command, the design and changes to the Match.com website, including the cancellation flow, and product analytics.	Direct examination: 2 hours Cross examination: 1 hour
16.	Augustin DuSablón	3482 Hog Market Rd. Farmville, NC 27828	If called, Mr. DuSablón would testify concerning his personal experience with the Match.com platform, including his efforts to cancel his subscription.	Direct examination: 1 hour Cross examination: 30 minutes
17.	Sharmistha Dubey	8750 N Central Expy, Suite 1400, Dallas, TX 75231	Ms. Dubey's testimony will include the subjects addressed when she served as representative for Defendant MGI's 30(b)(6) deposition. She will testify concerning her employment history and responsibilities. Ms. Dubey will testify concerning MGI's operations, its policies and procedures relating to the practices in Counts III-V, its executives (and their identities, duties, responsibilities, and chain of command), its corporate structure, dating sites, and relationship to subsidiary brands and companies. She will further testify concerning the Match.com website features and design. She will address the use of product analytics by Defendants. She will also testify concerning MGI's knowledge of the conduct at issue in the FTC's Amended Complaint.	Direct examination: 4 hours Cross examination: 2 hours

III. EXPERT WITNESS

	Witness	Address	Summary of Testimony	Expected Duration
1.	Jennifer King	1511 Cedar Street, Berkeley, CA 94703	Ms. King will testify concerning the subjects covered in deposition testimony and the opinions reflected in her expert reports. She will testify concerning her heuristic analysis and her inspection of Match.com website, including the cancellation flow and related pages. She will testify concerning her opinion on whether the cancellation flow is simple and her reasons for her conclusion.	Direct examination: 8 hours Cross examination: 4 hours

IV. RECORD CUSTODIANS¹

	Witness	Address	Summary of Testimony	Expected Duration
1.	Jim Elliott	2916 Rosedale Avenue, Dallas, TX 75205	Mr. Elliott would testify as a Former Custodian of Records for the Federal Trade Commission. He would authenticate information and documents produced by MGI in response to the Civil Investigative Demand issued by the FTC to Defendant in 2017.	Direct examination: 1 hour Cross examination: 1 hour
2.	Brent McPeck	1999 Bryan Street, Suite	Mr. McPeck would testify as a Custodian of Records for the Federal Trade	Direct examination: 1 hour

¹ The FTC's time estimates for its document custodians anticipate that the Court will pre-admit exhibits that the parties have agreed are admissible, pursuant to the FTC's request in its Motion in Limine. The FTC will additionally seek to submit to the record (for use at closing or in post-trial briefing) and to publish to the Court exhibits that the parties agree are relevant or for which relevancy is apparent from the face of the exhibit. Defendants have contended

		2150, Dallas, TX 75201	Commission. He would testify to the authenticity of records produced to or created by the FTC, including web captures. He would further testify concerning the authenticity of publicly available documents, including SEC filings.	Cross examination: 1 hour
3.	Taelor Hardesty	751 Harlingen Heights Drive, Harlingen, TX 78552	Mr. Hardesty would testify as a Former Custodian of Records for the Federal Trade Commission. He would testify concerning the authenticity of records, including those produced by Defendants, created by the FTC, or publicly available documents that have been downloaded or captured by the FTC.	Direct examination: 1 hour Cross examination: 1 hour
4.	David Beasley	1601 Elm Street, Suite 1600, Dallas, TX 75201	Mr. Beasley will authenticate evidence relating to the Better Business Bureau's records, including consumer complaints.	Direct examination: 1 hours Cross examination: 1 hour

Respectfully submitted,

DATED: May 12, 2025

/s/ Reid Tepfer
 REID TEPFER
 M. HASAN AIJAZ
 SARAH ZUCKERMAN (admitted *pro hac vice*)
 ERICA R. HILLIARD
 JASON MOON
 NICOLE G. H. CONTE (admitted *pro hac vice*)
 TAMMY CHUNG (admitted *pro hac vice*)
 Texas Bar No. 24079444 (Tepfer)

that the FTC should be required to admit each exhibit through live witness testimony—even for exhibits that the parties agree are relevant and authentic and to which Defendants have not otherwise objected. The FTC contends this is not in the interest of judicial economy, particularly at a bench trial. Should this be required, the FTC anticipates that Mr. McPeck, and potentially other document custodians, will need to provide additional testimony, which could significantly increase the time needed for their testimony.

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New York Bar No. 5603832 (Zuckerman)
Mississippi Bar No. 104244 (Hilliard)
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FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

On May 12, 2025, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on counsel by a manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Reid Tepfer
REID TEPFER